REMARKS

In the Office Action, claims 18-21 were allowed, claims 1-3, 6-9, 14, 22, 23, 25, 26, 29, 31 and 34 were rejected, and claims 4, 5, 10-13, 15-17, 27, 28, 30, 32 and 33 were objected to by the Examiner. Applicants thank the Examiner for allowing claims 18-21 and for indicating the allowability of claims 4, 5, 10-13, 15-17, 27, 28, 30, 32 and 33. Original dependent claims 4, 5, 10, 12, 13 and 15 have been placed into independent form, including all of the limitations of the base claim and any intervening claims, and should now be in condition for allowance along with any claims that depend therefrom.

Claims 4, 5, 10, 12, 13, 15, 22, 26, 28 and 29 have been amended, claims 6-9 and 23-25 have been canceled without prejudice, and claims 1-5, 10-22 and 26-34 remain pending in the present application. All claim amendments are fully supported throughout the written description and figures of the specification.

In the Office Action, the abstract of the disclosure and the first paragraph of the specification were objected to based on certain informalities. Accordingly, amendments have been made as suggested by the Examiner, and those objections are believed to be overcome.

Claim 1 was rejected under 35 USC 102(e) as anticipated by the Heath et al. reference, US Patent Application Publication No.: 2004/0043906. The rejection is respectfully traversed.

The Heath et al. reference discloses a system related to materials for sand control and hydraulic fracturing. In a background section, the reference discusses sand control systems and states "well completions are conventionally used for sand control purposes including fracture packing and gravel-packing techniques, prep-packed screens, wire wrapped screens and expandable screens." (See paragraph 0002). The reference provides this brief laundry list of alternative sand control techniques, but the reference does not disclose or even suggest the method of expanding an expandable sand screen in combination with gravel packing a rat hole of the well, as recited in claim 1. Accordingly, the rejection under 35 USC 102(e) is not proper and should be withdrawn.

Claims 2, 3, 6-9, 14, 22, 23, 25, 26, 29, 31 and 34 were rejected under 35 USC 102(e) as anticipated by the Nguyen et al. reference, US Patent Publication No.: 2002/0189808. This rejection is respectfully traversed.

The Nguyen et al. reference describes a method of gravel packing an annulus 23 between a shroud 20 and a well bore 10 via perforations 24 disposed through shroud 20. A well screen is assembled and lowered into wellbore 10 on a work string 28. A packer 26 can be set externally of the outer shroud 20 to isolate annulus 23 between the wellbore 10 and shroud 20. A gravel slurry is pumped down the work string 28, through a crossover, into an annulus 22 between a sand screen 21 and shroud 20, and then into annulus 23 along the exterior of shroud 20. Alternatively, the gravel slurry can be injected down the interior of screen 21 and up the annular space 23. (Paragraphs 0062-0065). Although the term "screen" is generically described as potentially comprising a wide variety of screens, including radially-expandable screens, a description of how radially expandable screens could be used in the actual implementation of the method described is believed absent. Accordingly, the Nguyen et al. reference fails to disclose or suggest numerous elements of the subject claims.

For example, the Nguyen et al. reference does not disclose or suggest the expanding of a pair of "spaced expandable sand screens in a well" that are connected to each other by an unexpanded tubing section in combination with "gravel packing the portion of the well around the unexpanded tubing section" as recited in claim 2. Not only does the Nguyen et al. reference fail to describe expanding such connected expandable sand screens in a well, but the Nguyen et al. method focuses on gravel packing an exterior annulus (i.e. the annulus external to the shroud which is spaced from and surrounding the sand screen), rather than gravel packing an unexpended tubing section connecting expandable screens. Similarly, the Nguyen et al. reference fails to describe expanding an expandable sand screen "below an unexpended tubing section" in combination with gravel packing around the unexpanded tubing section "above the expandable sand screen" as recited in independent claim 14. The Nguyen et al. reference also fails to disclose or suggest the subject matter of amended, independent claim 22. For example, the reference does not disclose or suggest at least two expandable tubing sections and an unexpanded tubing section that form an outer conduit in combination with an inner completion

positioned in the outer conduit, the "inner completion comprising a completion tubing and a seal." The Nguyen et al. reference discloses a seal/packer 26, but that device is disposed externally of shroud 20 to isolate annulus 23, a wholly different arrangement. Accordingly, independent claims 2, 14 and 22 are patentably distinct over the cited reference.

Claims 3, 25, 26, 29, 31 and 34 ultimately depend from either independent claim 2 or independent claim 22 and are patentably distinct for the reasons provided above with respect to the independent claims as well as for the unique subject matter recited in each dependent claim. Claims 6-9 and 23 have been canceled without prejudice.

Claims 6-8 and 14 were rejected under 35 USC 102(e) as anticipated by the Haut et al. reference, US Patent No.: 6,263,966. The rejection is respectfully traversed. However, claims 6-8 have been canceled without prejudice.

The Haut et al. reference describes a system for depositing gravel 42 in an annulus 44 about a screen 10. The screen 10 is moved into the well bore, and the gravel 42 is deposited about the screen. Subsequently, radial expansion of screen 10 is used to redistribute the gravel 42 in annulus 44. (Column 4, lines 51-61). The reference, however, does not disclose the method of expanding an expandable sand screen below an unexpanded tubing section and then gravel packing a region "around the unexpanded tubing section" above the expandable section, as recited in claim 14. Accordingly, claim 14 is believed patentable over the cited reference.

Claims 23 and 24 were rejected under 35 USC 101 on the basis of double patenting. However, claims 23 and 24 have been canceled without prejudice, and the rejection is believed moot.

A check made payable to the Commissioner of Patents and Trademarks has been enclosed to cover the fees for additional independent claims. However, if the payment is not sufficient, please charge deposit account 50-3054 for any deficiency in fees.

In view of the foregoing remarks, the pending claims are believed patentable over the cited references. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Date: September 22, 2004

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